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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BLUE CASTLE (CAYMAN) LTD.,  
*Plaintiff,*  
vs.

Docket No.:  
24-cv-00953-ARL

DAVID JONES; JACQUELINE CALLAHAN;  
PRINCIPIS CAPITAL, LLC; TOPROCK FUNDING,  
LLC; INCORPORATED VILLAGE OF LYNBROOK;  
THE PEOPLE OF THE STATE OF NEW YORK;  
NASSAU COUNTY DISTRICT ATTORNEY; TOWN  
OF OYSTER BAY TAX COLLECTOR; “JOHN DOE”  
and “JANE DOE,” the last two names being fictitious,  
said parties intended being tenants or occupants, if any,  
having or claiming an interest in, or lien upon, the  
premises described in the complaint,

**DECLARATION IN SUPPORT  
OF REQUEST FOR CLERK’S  
CERTIFICATE OF DEFAULT**

*Defendants.*

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Shauna M. DeLuca, an attorney duly admitted to practice before the Courts of the State of New York, hereby declares the following to be true under the penalties of perjury:

1. I am an attorney admitted to practice in the Federal Court of the Eastern District of the State of New York. I am associated with the law firm of Hasbani & Light, P.C., attorneys for the Plaintiff in the above-entitled action. I am familiar with all the facts and circumstances in this action.
2. This Declaration is submitted in support of Plaintiff’s request that default be entered against defendants DAVID JONES; JACQUELINE CALLAHAN; PRINCIPIS CAPITAL, LLC; TOPROCK FUNDING, LLC; INCORPORATED VILLAGE OF LYNBROOK; THE PEOPLE OF THE STATE OF NEW YORK; NASSAU COUNTY DISTRICT ATTORNEY; and TOWN OF

OYSTER BAY TAX COLLECTOR (collectively the “Defendants”) pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

3. This action was commenced on February 7, 2024 by filing a complaint pursuant to RPAPL § 1301 to foreclose on the real property located at 4 Cedar Street, Massapequa, NY 11758, known on the Nassau County Tax Map as Block: 182 Lot: 1, 2 & 236 Section: 57 in the County of Queens and State of New York (the “Property”). *See*, ECF Dkt. No. 1.

4. As appears by the affidavits of service duly electronically filed, pursuant to Rule 4(e) of the Federal Rules of Civil Procedure, the following Defendants named in the Complaint were duly served with the Summons and Complaint more than twenty-one days ago but have failed to answer or appear in this matter:

- a. The Defendant, INCORPORATED VILLAGE OF LYNBROOK, was served on February 16, 2024. A true and accurate copy of this affidavit of service is attached hereto as **Exhibit “A”**. *See also*, ECF Dkt. No. 8.
- b. The Defendant, NASSAU COUNTY DISTRICT ATTORNEY was served on February 16, 2024. A true and accurate copy of this affidavit of service is attached hereto as **Exhibit “B”**. *See also*, ECF Dkt. No. 9.
- c. The Defendant, TOWN OF OYSTER BAY TAX COLLECTOR was served on February 16, 2024. A true and accurate copy of this affidavit of service is attached hereto as **Exhibit “C”**. *See also*, ECF Dkt. No. 10.
- d. The Defendant, JACQUELINE CALLAHAN was served on February 20, 2024. An additional copy of the documents were mailed to JACQUELINE CALLAHAN on February 23, 2024. A true and accurate copy of this affidavit of service and affidavit of mailing are collectively attached hereto as **Exhibit “D”**. *See also*, ECF Dkt. No. 11.

- e. The Defendant, DAVID JONES was served on February 20, 2024. A true and accurate copy of this affidavit of service is attached hereto as **Exhibit “E”**. *See also*, ECF Dkt. No. 14.
- f. The Defendant, PRINCIPIS CAPITAL, LLC was served on February 20, 2024. A true and accurate copy of this affidavit of service is attached hereto as **Exhibit “F”**. *See also*, ECF Dkt. No. 15.
- g. The Defendant, TOPROCK FUNDING, LLC was served on February 20, 2024. A true and accurate copy of this affidavit of service is attached hereto as **Exhibit “G”**. *See also*, ECF Dkt. No. 16.
- h. The Defendant, THE PEOPLE OF THE STATE OF NEW YORK was served on February 21, 2024. A true and accurate copy of this affidavit of service is attached hereto as **Exhibit “H”**. *See also*, ECF Dkt. No. 17.

5. Defendants are in default for want of defense or answer, although the time for the defendants to answer or otherwise defend this action has expired.

**WHEREFORE**, it is hereby requested that the Clerk of Court enter default against the Defendants in accordance with Rule 55(a) of the Federal Rules of Civil Procedure.

Pursuant to Title 28, United States Code Section 1746, I hereby state under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief.

Dated: New York, New York  
March 15, 2024

**HASBANI & LIGHT, P.C.**

/s/ Shauna M. DeLuca  
Shauna M. DeLuca